

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,

Plaintiff,

V.

IGAL SHARON LEVY,

Defendant.

Criminal Action No. 06- 56

REDACTED

INDICTMENT

The Grand Jury for the District of Delaware charges that:

COUNT ONE

Scheme and Artifice to Defraud



1. Igal Sharon Levy, defendant herein, opened an American Express Business Green Rewards Card account, account number XXXX-XXXXXX-X1001, for his business, Consumer Electronics Warehouse. Levy filled out the application for the account using the identifying information of M.B. and added “Sharon Levy” as an authorized user on the account.

2. From December 2005 through April 2006, Levy used credit cards associated with this account to purchase large numbers of expensive television sets at a Circuit City store in Wilmington, Delaware. Levy planned to sell the television sets as part of his business, which provides electronics equipment to consumers over the Internet. In making these credit card purchases, Levy accumulated approximately \$577,000 in unpaid debt on the account by April 2006.

3. In order to ensure that the American Express account would not be cancelled while he continued to make purchases using credit cards associated with that account, Levy planned to submit fraudulent electronic payments to American Express. Pursuant to this scheme,

Levy made two electronic transfers from a Consumer Electronics Warehouse account at PNC Bank, account number XXXXXX0578, to the American Express account, despite the fact that Levy knew that the PNC Bank account did not have sufficient funds to cover those payments.

Charging Paragraph

4. On or about February 22, 2006, in the State and District of Delaware, Igal Sharon Levy, defendant herein, having devised and having intended to devise a scheme and artifice to defraud, as more fully set forth in paragraphs 1 through 3 of this Count of the Indictment, incorporated herein by reference, did cause to be transmitted by means of a wire communication in interstate commerce, writings, signs and signals for the purpose of executing such scheme and artifice, to wit, Levy caused an electronic payment to be made from the PNC Bank account to the American Express account in the amount of \$75,000, which was later returned due to insufficient funds, in violation of 18 U.S.C. § 1343.

COUNT TWO

On or about March 1, 2006, in the State and District of Delaware, Igal Sharon Levy, defendant herein, having devised and having intended to devise a scheme and artifice to defraud, as more fully set forth in paragraphs 1 through 3 of Count One of the Indictment, incorporated herein by reference, did transmit and cause to be transmitted by means of a wire communication in interstate commerce, writings, signs and signals for the purpose of executing such scheme and artifice, to wit, Levy caused an electronic payment to be made from the PNC Bank account to the American Express account in the amount of \$75,000, which was later returned due to insufficient funds, in violation of 18 U.S.C. § 1343.

COUNT THREE

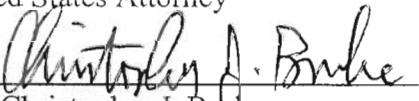
On or about the time period from December 2005 through April 2006, in the State and

District of Delaware, Igal Sharon Levy, defendant herein, did knowingly and with intent to defraud, traffic in and use unauthorized access devices, specifically credit cards associated with an American Express Business Green Rewards Card account, account number XXXX-XXXXXX-X1001, which conduct affected interstate commerce, and by such conduct obtained things of value, specifically televisions, aggregating more than \$1,000 during that time period, in violation of Title 18, United States Code, Section 1029(a)(2).

A TRUE BILL:

Foreperson

COLM F. CONNOLLY
United States Attorney

BY: 
Christopher J. Burke
Assistant United States Attorney

Dated: May 11, 2006